

Sattellberg
U.S. DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

ROCKY MOUNTAIN ARSENAL
COMMERCE CITY, CO 80022

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U.S. Department of Energy
Attention: Proposed Plan Comments
Rocky Flats Environmental Technology Site
12101 Airport Way, Unit A
Broomfield, Colorado 80021-2583

ADMIN RECORD



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Rocky Mountain Arsenal National Wildlife Refuge
Building 111
Commerce City, Colorado 80022-1748
Telephone (303) 289-0232 Fax (303) 289-0579

File Code: RF

September 12, 2006

U.S. Department of Energy
Attention: Proposed Plan Comments
Rocky Flats Environmental Technology Site
12101 Airport Way, Unit A
Broomfield, Colorado 80021-2583

To Whom It May Concern:

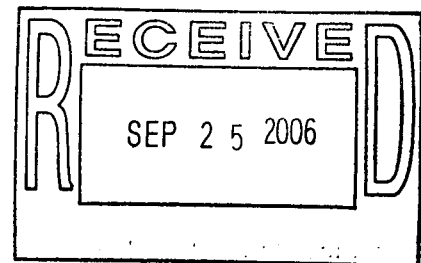
The U.S. Fish and Wildlife Service (Service) would like to thank the Department of Energy for the opportunity to review the Rocky Flats Environmental Technology Site Proposed Plan (Proposed Plan). The Service believes that the Proposed Plan represents a solid remedy that is compliant with all regulatory requirements and that will allow the Rocky Flats National Wildlife Refuge to become an asset to the communities in the Northwest Denver area. We have some general comments that we would like DOE to regard while drafting the Corrective Action Decision/Record of Decision. We appreciate the opportunity to have our comments considered.

Sincerely,

R. Mark Sattelberg
U.S. Fish and Wildlife Service

Attachment

cc: John Rampe, DOE-EM
Mark Aguilar, EPA
Carl Spreng, CDPHE
Scott Surovchak, DOE-LM



ADMIN RECORD

SW-A-006058

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**U.S. Fish and Wildlife Service's Comments on the
Rocky Flats Environmental Technology Site Proposed Plan
September 12, 2006**

1. The U.S. Fish and Wildlife Service (Service) appreciates being able to work with the Rocky Flats Cleanup Agreement (RFCA) Parties on issues related to the Remedial Investigation/Feasibility Study, in particular, the Ecological Risk Assessment. We look forward to working with the RFCA Parties on the Corrective Action Decision/Record of Decision (CAD/ROD) and the post-CAD/ROD agreement.
2. The Service is pleased to know that the lands to be transferred for the Rocky Flats National Wildlife Refuge are unrestricted in their use and that the majority of the land is at or below the risk level that both the U.S. Environmental Protection Agency and the Colorado Department of Public Health and Environment require.
3. The Service knows that there will be limited water in the drainages, especially the Walnut Creek Drainage. This combined with the fact that contaminated groundwater in Central Operable Unit (OU) and up-gradient of the terminal ponds is currently being captured and treated before entering the creeks. It is important that any quantity of water that leaves the terminal ponds meet water quality standards before entering future refuge property. We would like to continue to work with the Department of Energy (DOE) to keep water quality as good as technically possible and water quantity to maintain Preble's meadow jumping mouse habitat as much as possible..
4. The Service supports the reconfiguration of OUs. The reconfiguration will make the administration and management of these parcels of land easier in the future. We appreciate that the DOE took our previous letter concerning the fence and signs into consideration. We request that the actual, "on-the-ground" location of the fence be a joint endeavor with the RFCA parties and the Service.
5. The signage that will be posted on the Central OU boundary is important. The Service has previously submitted a recommendation for wording on those signs. We would be willing to work on the language for those signs. We also recommended that DOE ensure the signs are made of durable materials. In the future, we would request that the Service and the DOE cooperatively work on site interpretation signs for the Refuge.
6. In addition, the letter recommending the fence and the signs also recommends installing permanent markers or monuments demarcating "special areas" such as areas of remaining subsurface contamination, subsurface structures (foundations and process lines), the present landfill, the original landfill, any ash pit or trench that was not totally removed. Nothing in the Proposed Plan addresses anything similar to this recommendation.

7. The Service agrees that the Ecological Risk Assessment tends to show that there is no unacceptable risk to ecological receptors at the site. However, there were areas of uncertainty that should be taken into account. The Service would like to recommend that minimal biological monitoring continue at the site and that if unexpected morbidity or mortality events occur, that they be reported and investigated.
8. The Service supports the selection of Alternative 2. Alternative 1 is not protective of human health and the environment and Alternative 3 increases habitat disturbance with minimal risk reduction and a large cost to implement. We also believe that it is imperative that DOE implement a well-designed and unyielding operation and maintenance program.
9. The Service looks forward to working together to make Rocky Flats a genuine asset to the Denver metropolitan area.